

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

PAUL DAVIS,)	
)	
Plaintiff,)	
)	Civil Action No. 04-11851-WGY
v.)	
)	
SUFFOLK COUNTY AND)	
ANDREA CABRAL)	
(in her official capacity))	
)	
Defendants.)	

JOINT DISCOVERY PLAN PURSUANT TO FED. R. CIV. P. 16(b)
AND LOCAL RULE 16.1

Now come the parties to the above-captioned matter, and hereby submit the following Joint Proposal for a Pre-Trial Schedule¹:

1. Service of all written discovery, including Required Disclosures pursuant to Rule 26(a)(1), by or before April 15, 2005;
2. Depositions of fact witnesses completed by or before July 11, 2005;
3. Disclosures of experts for plaintiff by July 15, 2005 and for defendant by August 12, 2005;
4. Dispositive motions filed with the Court by or before September 15, 2005; and
5. Trial by jury — November 2005.

¹ The dates that are proposed above are subject to the fact that counsel for Mr. Davis are currently scheduled to begin a trial before Hon. Nancy Gertner in the criminal matter United States v. Green, et al. (02-10301 NG) on March 21, 2005. It is anticipated that this trial could last between two (2) and three (3) months. Subject to the consent of defense counsel, therefore, plaintiff's counsel may need to request an extension of these deadlines.

Respectfully submitted,

DEFENDANTS

By their attorney,

/s James M. Davin

James M. Davin (BBO# 566973)
Deputy General Counsel
Suffolk County Sheriff's Dept.
200 Nashua Street
Boston, MA 02114
(617) 989-6679

PAUL DAVIS

By his attorneys,

/s Christie M. Charles

George F. Gormley (BBO# 204140)
Christie M. Charles (BBO# 646995)
George F. Gormley, P.C.
655 Summer Street
Boston, MA 02210
(617) 478-2750